



North Carolina Department of Health and Human Services Division of Social Services

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July 1, 2009

Dear County Directors of Social Services

ATTENTION: All State and Local Security Officers

SUBJECT: Update to the Information Security Manual

The purpose of this letter is to obsolete Dear County Directors of Social Services letter PM-REM-6-2009 dated May 29, 2009, and to notify you of a comprehensive update to the Information Security Program first introduced in July 2007. Attached you will find the revised Version 3 of the Information Security Manual dated July 1, 2009. This revision includes a PowerPoint presentation that is now available for use in training staff on Social Security Administration data security. This training tool is referenced in Section 6. The SSA training form in (Appendix 12) has also been revised to indicate use of the PowerPoint presentation for training purposes. The revised form should be used immediately.

General information is provided in this letter regarding use of the forms that are appendices to the Manual. Also attached, for your convenience, are the revised Information Resource Access Authorization Form (IRAAF) and the Security Officer Change Authorization Form. The other forms may be copied from the manual appendices as you need them. The forms are:

1. **Memorandum of Understanding (MOU)**
2. **Information Resource Access Authorization Form (IRAAF)**
3. **Security Officer Change Authorization Form**
4. **ACTS Worker Profile Request Form**
5. **OCSE Agreement to Safeguard Confidential Data**
6. **ACTS Inquiry Access Only Request Form**
7. **Manual Incident Reporting Form**
8. **Documentation of SSA Training Form**
9. **Documentation of County Security Review**

10. Remote Workplace Certification Checklist

Most of the documents are designed as true forms in Microsoft Word, but are distributed as “unlocked” and as such, may be edited like all unprotected Word documents. To use them as forms, click on View in the Word Main Menu bar; then click Toolbars and Forms. That will display the Forms toolbar. Click on the lock icon on the far right to lock the form, which prevents editing and allows you to tab through the fields, or use the scroll bar and cursor to navigate the form without tabbing through all fields. Any of the forms in the manual may be adapted for internal use. However, to insure consistency, changes should not be made to any form being submitted to the state. To modify forms, unlock them as described above if necessary.

Both state and county security officers should start using these forms immediately. As explained in the Information Security Manual, the manual version of the Incident Reporting Form is to be used only if the web based reporting is unavailable. IRAAF forms are to be both faxed and e-mailed to the Customer Support Center to insure receipt of a legible copy. Note that there is a field on each page of the IRAAF for the worker’s name and number in case pages get separated in the CSC.

[Dear County Director Letter PR-REM-04-2007](#) (July 10, 2007) recommended that counties who do not have accurate records establish an inventory of all individuals with existing access to the State Information Systems. The Information Resources Access Authorization Form (IRAAF) should be used for that purpose. One way to establish an inventory is to have each user fill out their own form and then have their access rights verified by their supervisor. It is mandatory that an IRAAF form be on file with DHHS Customer Support for every employee with access to any State Information System by August 31, 2010.

[Dear County Director Letter PR-REM-04-2007](#) also described two changes that were required effective August 15, 2007: (1) All staff that access SSA data, including contracted employees, are required to sign a Memorandum of Understanding (MOU), and (2) All staff that access SSA data including contracted employees, must receive documented training on the SSA contract. The required MOU is found in Appendix 1 of the Information Security Manual. The training documents and resources can be found on-line at <http://www.ncdhhs.gov/dma/>. Click on “For County Staff” and then click on the “Medicaid Training Resources” link. The resources for the SSA contract guidelines are listed as “Social Security Administration Agreement - SDX-BENDEX-SVES- Agreement and Attachments A through D”. Each employee/contractor must sign the SSA Training form located in the Security Manual. Training must be completed initially and annually thereafter. The SSA Training form is Appendix 12 in the Security Manual. Refer to Section 6 of the Security Manual for additional requirements for contract and off-site staff having access to SSA data. Contractors must receive a copy of the DHHS/SSA agreement. Off-site contractors and county employees accessing SSA data remotely are subject to regular security off-site compliance reviews. The Remote Workplace Certification Checklist will be utilized for these inspection reviews. Additional information with regard to the inspection reviews will be forthcoming under separate cover.

County security officers must also review the training materials for the IRS data with all county DSS staff (on and off-site) that access IRS FTI data (FRR and BEER Reports). These training materials can be found on-line at <http://www.ncdhhs.gov/dma/>. Click on “For County Staff”, then click on the “Medicaid Training Resources” link, and then click “Annual Safeguard Awareness Training”. The resources for the IRS data security training are the “Training

Presentation” (PDF Slideshow) and DMA Administrative Letter 16-02, with Addendums, Attachments, and IRS Publication 1075. Refer to Section 6 of the Security Manual for additional requirements for staff having access to IRS data. Please note that there is important information in this Section pertaining to county departments of social services that utilize on-site shredding companies to dispose of IRS data.

New audit requirements became effective June 1, 2009. County security officers are required to complete security reviews twice each year for each employee with access to the State Information Systems to ensure access is still valid and that the required authorizations are on file. Appropriate action must be taken to correct any discrepancies found. Refer to Review User Access found in Section 3.3 of the Security Manual for additional information. County security officers must complete and sign the Documentation of County Security Review form found in Appendix 13.

Please take time to carefully review the Information Security Manual and other publications addressed in this letter. The security policies and procedures addressed are vital to our continued operations and continued access to sensitive Federal data. I would like to thank all state and local security officers for their assistance in implementing these changes. If you have any questions, feel free to contact me at Hank.Bowers@ncmail.net.

Sincerely,



Hank Bowers, Chief
Performance Management/Reporting &
Evaluation Management Section

HB/

Attachment

cc: Jack Rogers
EMT
Local Business Liaisons
Pyreddy Reddy
Jonnette Earnhardt
Suzanne Merrill
DHHS Customer Support

PM-REM-09-2009